

ORIGINAL

OCT 28 2020

James M. Hatten, Clerk
By: *[Signature]*
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

ROBERT ELLIOTT SHEPPARD

Criminal Indictment

No. **1 20 - CR - 415**

UNDER SEAL

THE GRAND JURY CHARGES THAT:

Count 1

Beginning on or about a date unknown and continuing until at least September 8, 2016, in the Northern District of Georgia, the defendant, ROBERT ELLIOTT SHEPPARD, did knowingly and willfully combine, conspire, confederate, agree and have a tacit understanding with Dexter Bernard Frazier, Tonie Harris, and Clifton Curtis Lee, to violate Title 21, United States Code, Section 841(a)(1), that is to knowingly and intentionally possess with intent to distribute a controlled substance, said conspiracy involving at least 500 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and less than 50 kilograms of marijuana, a Schedule I controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(B) and (b)(1)(D), all in violation of Title 21, United States, Section 846.

Counts 2 - 7

On or about the dates set forth in column B, in the Northern District of Georgia, the defendant, ROBERT ELLIOTT SHEPPARD, aided and abetted by the individuals listed in column C, attempted to knowingly and intentionally use a communication facility, that is the mail, in committing and in facilitating the commission of an act and acts constituting a felony under Title 21, United States Code, Section 841(a)(1), that is possession with the intent to distribute a controlled substance, all in violation of Title 21, United States Code, Sections 843(b) and 846 and Title 18, United States Code, Section 2:

A	B	C
Count No.	Date	Participants
2	August 10, 2016	Dexter Bernard Frazier Tonie Harris
3	August 15, 2016	Dexter Bernard Frazier Tonie Harris
4	August 18, 2016	Dexter Bernard Frazier Clifton Curtis Lee
5	August 24, 2016	Dexter Bernard Frazier Clifton Curtis Lee
6	August 31, 2016	Dexter Bernard Frazier Clifton Curtis Lee
7	September 8, 2016	Dexter Bernard Frazier Tonie Harris

property or seek a money judgment against said defendant for any amount that would constitute the proceeds of such violation.

A TRUE BILL
[Signature]
FOREPERSON

BYUNG J. PAK
United States Attorney

[Signature]

GARRETT L. BRADFORD
Assistant United States Attorney
Georgia Bar No. 074374

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JILL E. STEINBERG
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